

NICHOLAS A. TRUTANICH
United States Attorney
District of Nevada
Nevada Bar Number 13644
DANIEL J. COWHIG
Assistant United States Attorney
United States Attorney's Office
501 Las Vegas Boulevard South, Suite 1100
Las Vegas, Nevada 89101-6514
(702) 388-6336 / Fax: (702) 388-6020
daniel.cowhig@usdoj.gov

Representing the United States of America

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

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UNITED STATES OF AMERICA,

Plaintiff,

vs.

JESSICA YVETTE FIGUEROA,

Defendant.

Case No. 2:16-cr-201-APG-NJK

SIXTH STIPULATION TO
CONTINUE SENTENCING

It is hereby stipulated and agreed between the United States of America, by and through Nicholas A. Trutanich, United States Attorney, and Daniel J. Cowhig, Assistant United States Attorney, and Adam M. Solinger, Esq., Las Vegas Defense Group, counsel for defendant Jessica Yvette Figueroa, that the sentencing hearing set for Tuesday, April 16, 2019 at 2:00 p.m. in Courtroom 6C before the Honorable Andrew P. Gordon be vacated and continued to a date and time convenient to the Court but no earlier than 60 days hence.

This stipulation is entered into for the following reasons:

1. This is a joint request by counsel for the United States and for the defendant;

1 2. The additional time requested by this stipulation is reasonable pursuant to
2 Federal Rule of Criminal Procedure 32(b)(2) which allows that “the Court may, for good cause,
3 change any limits prescribed in this rule;”

4 3. Both counsel request this additional time to allow adequate time to research
5 sentencing issues and prepare for the sentencing hearing;

6 4. Defendant Figueroa is at liberty on bond and consents to the continuance;

7 5. The United States Probation Office supervising defendant Figueroa has not
8 reported any significant violation of the bond conditions;

9 6. This is the sixth such request for continuance.

10 For these reasons, the ends of justice would best be served by a continuance of the
11 sentencing hearing to a date and time convenient to the Court but no earlier than 60 days
12 hence.

13 A proposed order is attached.

14 Respectfully Submitted: April 12, 2019

15 Counsel for the Defendant
16 JESSICA YVETTE FIGUEROA

NICHOLAS A. TRUTANICH,
United States Attorney

17 _____/s//_____
18 ADAM M. SOLINGER, Esq.
Las Vegas Defense Group

_____/s//_____
DANIEL J. COWHIG
Assistant United States Attorney

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6 UNITED STATES DISTRICT COURT
7 DISTRICT OF NEVADA

-oOo-

8 UNITED STATES OF AMERICA,

9 Plaintiff,

10 vs.

11 JESSICA YVETTE FIGUEROA,

12 Defendant.
13

Case No. 2:16-cr-201-APG-NJK

PROPOSED
FINDINGS OF FACT,
CONCLUSIONS OF LAW,
AND ORDER

14 Findings of Fact

15 Based on the pending stipulation of counsel, and good cause appearing therefore, the
16 Court finds that:

- 17 1. This is a joint request by counsel for the United States and for the defendant;
18 2. The additional time requested by this stipulation is reasonable pursuant to
19 Federal Rule of Criminal Procedure 32(b)(2) which allows that “the Court may, for good cause,
20 change any limits prescribed in this rule;”
21 3. Both counsel request this additional time to allow adequate time to research
22 sentencing issues and prepare for the sentencing hearing;
23 4. Defendant Figueroa is at liberty on bond and consents to the continuance;
24

1 5. The United States Probation Office supervising defendant Figueroa has not
2 reported any significant violation of the bond conditions;

3 6. This is the sixth such request for continuance.

4 Conclusions of Law

5 The ends of justice would be served by granting a continuance of the sentencing hearing.
6 Were the continuance not granted, it would likely result in a miscarriage of justice, deny the
7 parties sufficient time to effectively and thoroughly prepare for sentencing, taking into account
8 the exercise of due diligence.

9 ORDER

10 IT IS HEREBY ORDERED, based upon the stipulation of the parties and the record in this
11 case and for good cause shown, that the sentencing hearing currently scheduled for Tuesday,
12 April 16, 2019 at 2:00 p.m. is continued to August 8, 2019 at
13 10:00 a.m. in Courtroom 6C.

14 IT IS SO ORDERED this April 15, 2019:

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17 THE HONORABLE ANDREW P. GORDON
18 JUDGE, UNITED STATES DISTRICT COURT
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CERTIFICATE OF SERVICE

I, Daniel J. Cowhig, certify that the following individual was served with a copy of the
SIXTH STIPULATION TO CONTINUE SENTENCING on this date by the Electronic Case

File system:

Adam M. Solinger
Las Vegas Defense Group
2300 W Sahara Ave, Ste 450
Las Vegas, NV 89102
702-333-3673
Fax: 702-974-0524
Email: adam@702defense.com

Counsel for Jessica Yvette Figueroa

DATED: April 12, 2019

//s//
DANIEL J. COWHIG
Assistant United States Attorney